

SIMPLICITY/INTEGRATION WORK GROUP

The Simplicity/Integration Workgroup makes the following recommendations:

- 1) The format of the regulation should be a default reportable quantity which would apply to most situations and substances (avoiding long lists of chemicals and quantities) and then include two categories of exceptions, one for extremely hazardous substances or **sensitive locations** (such as aquifer protection areas) and one for significantly less hazardous substances or locations (such as containment areas).

Define

- 2) A guidance document should be developed to assist the public/regulated community in determining the volume equivalent to 10 pounds for their particular substance.

- 3) There should be consideration of including USTs in any exception for petroleum releases.

- 4) If a release is below the default reportable quantity and actions are **initiated** within 30 minutes to contain, remove, and mitigate, no reporting is required if the cleanup is completed within 24 hours.

Define initiated

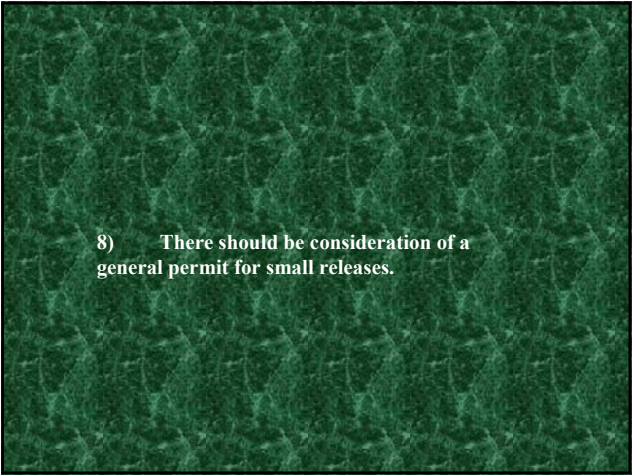
Include a definition of contain and containment similar to the MCP:

Actions taken in response to a release or threat of release of oil or hazardous material to prevent or minimize such release so that it does not migrate or otherwise cause or threaten substantial danger to present or future health, safety, public welfare or the environment. The term shall also include security measures, including, without limitation, the building of fences for the purpose of limiting and restricting access to a site or a vessel where there has been a release or there is a threat of a release of oil or hazardous material.

- 5) "Initiate" as used in (4) above can mean, among other actions, simply contacting a spill cleanup contractor.

- 6) The default reportable quantity should not include the time component contained in the federal RQs whereby the RQ applies only if it is reached within a 24 hour period. The quantity released would continue to add toward the RQ until the source is stopped.

- 7) There should be an exception considered for releases of gaseous substances if the release is regulated elsewhere or covered by a permit.



8) There should be consideration of a general permit for small releases.